

JACOBS & BARBONE, P.A.

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

EDWIN J. JACOBS, JR.

MICHAEL F. MYERS

LOUIS M. BARBONE

YOONIEH AHN

ARTHUR J. MURRAY

JOHN R. STEIN

1125 PACIFIC AVENUE

ATLANTIC CITY, NEW JERSEY 08401

PHONE: (609) 348-1125

FAX: (609) 348-3774

E-MAIL: JACOBSBARBONE@COMCAST.NET

January 2, 2015

Sent Via ECF

Honorable Jerome B. Simandle
United States District Judge
United States District Court
Mitchell H. Cohen U.S. Court House
1 John F. Gerry Plaza, Room 6010
P.O. Box 888
Camden, N.J. 08101-0888

RE: U.S.A. v. Todd Reeves, et al.
Criminal No. 11-520 (JBS)
Our File No. 12,986

Dear Judge Simandle:

Please accept this letter on behalf of all defense counsel, including counsel for defendant Kenneth Bailey whose sentencing is currently scheduled for Wednesday, January 7, 2015.

Each defendant has submitted sentencing memoranda addressing common legal issues. We believe it would benefit the parties if all sentencing hearings were heard on the same day with defense counsel using a "designated hitter" for each legal issue. In addition to preserving judicial resources, we believe this would enable the Court to consider the arguments of all counsel before reaching a precedent setting determination on legal issues affecting all defendants.

A teleconference among all parties may be helpful. Your Honor's attention is greatly appreciated.

Respectfully,

JACOBS & BARBONE, P.A.

/s/ Edwin J. Jacobs, Jr.

Cc: All counsel